

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PHOENIX SERVICES TOPCO LLC, *et al.*,

Debtors.

Chapter 11

Case No. 22-10906 (MFW)

(Jointly Administered)

**U.S. SPECIALTY INSURANCE COMPANY'S WITNESS & EXHIBIT
LIST FOR THE JUNE 21, 2023 HEARING**

U.S. Specialty Insurance Company, for itself and on behalf of its affiliated sureties (collectively, “USSIC”), by and through undersigned counsel, hereby submits its Witness & Exhibit List for the hearing to be held on June 21, 2023 at 10:30 a.m. (the “Hearing”) as follows:

WITNESS LIST

USSIC may call the following witness:

1. Frank M. Lanak, Executive Vice President, U.S. Specialty Insurance Company. The witness will testify as to the facts set forth in the Lanak Declaration and exhibits attached thereto;

In addition to the above-listed witness, USSIC reserves the right to call the following witnesses:

1. Any witness listed or called by any other party;
2. Rebuttal witnesses as necessary; and
3. USSIC reserves the right to cross-examine any witness called by any other party.

EXHIBITS

Exhibit	Description
1	Final Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Claims, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, and (VI) Granting Related Relief [Doc. No. 237]
2	Objection of U.S. Specialty Insurance company to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates [Doc. No. 881]

Exhibit	Description
3	Declaration of Frank M. Lanak In Support of the Objection of U.S. Specialty Insurance company to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates [Doc. No. 881-1]
4	Exhibits to the Declaration of Frank M. Lanak In Support of the Objection of U.S. Specialty Insurance company to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates [Doc. No. 881-2]
5	Amended Joint Chapter 11 Plan of Reorganization [Doc. No. 895]
6	Notice of Filing of Second Plan Supplement [Doc. No. 897]
7	Certification of Counsel In Support of U.S. Specialty Insurance Company's Objection to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates [Doc. No. 900]
8	Supplemental Declaration of Frank M. Lanak In Support of U.S. Specialty Insurance Company's Objection to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates [Doc. No. 901]
9	Exhibit to Supplemental Declaration of Frank M. Lanak In Support of U.S. Specialty Insurance Company's Objection to the Joint Prepackaged Chapter 11 Plan of Reorganization of Phoenix Services Topco, LLC and its Debtor Affiliates (Customs Entry Summary) [Doc. No. 901-1]
10	Proof of Claim No. 536 (Amended), Filed by U.S. Specialty Insurance Company [Attached]
--	Any exhibit necessary for purposes of impeachment and/or rebuttal
--	Any exhibit identified by any other party

RESERVATION OF RIGHTS

USSIC reserves (a) the right to amend and/or supplement this Exhibit List at any time prior to the Hearing, and (b) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Exhibit List as appropriate. USSIC also reserves the right to rely upon and use as evidence (a) exhibits included on the Exhibit Lists of

any other parties in interest, and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: June 19, 2023

/s/ Gaston P. Loomis

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